

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)  
SUBJECT ACCOUNT (SnapChat User:  
"j\_smith5892"):

Case No. MJ22-590

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SUBJECT ACCOUNT as further described in Attachment A

located in the Central District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

## Code Section

## Offense Description

18 USC 2422(b), 2252(a)(2),  
(b)(1), 2252(a)(4)(B), (b)(2)

Enticement of a Minor, Receipt/Distribution of Child Pornography, Possession of Child Pornograph,

The application is based on these facts:

- ☒ See Affidavit of , continued on the attached sheet.

☐ Delayed notice of days (give exact ending date if more than 30 days: ) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

KRYSTLE L  
MENDOZA

Digitally signed by KRYSTLE L  
MENDOZA  
Date: 2022.12.16 10:32:14 -08'00'

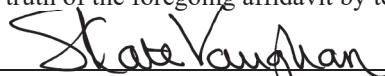
Applicant's signature

Krystle Mendoza, Special Agent

Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or
- ☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 12/19/2022

  
Judge's signature

City and state: Seattle, Washington

S. Kate Vaughan, United States Magistrate Judge

Printed name and title



1           3.     My training included courses in law enforcement techniques, federal criminal  
2 statutes, conducting criminal investigations, and the execution of search warrants. I have  
3 participated in the execution of several search warrants which involved child exploitation  
4 and/or child pornography offenses and the search and seizure of computers and other digital  
5 devices. I have observed and reviewed numerous examples of child pornography in various  
6 forms of media, including media stored on digital media storage devices such as computers,  
7 tablets, cellphones, etc.

8           4.     I am a member of the Internet Crimes Against Children (ICAC) Task Force in  
9 the Western District of Washington, and work with other federal, state, and local law  
10 enforcement personnel in the investigation and prosecution of criminal violations relating to  
11 child exploitation and child pornography, including violations pertaining to the unlawful  
12 production, importation, distribution, receipt, attempted receipt, and possession of child  
13 pornography and material involving the sexual exploitation of minors in violation of 18  
14 United States Code §§ 2251, 2252(a), and 2252A(a)(4)(B), 2422, 2243(a)(1).

15           5.     I make this affidavit in support of an application for a search warrant for  
16 information associated with certain accounts that are stored at premises controlled by  
17 Snapchat, Inc. an online electronic and remote cloud storage service located at 2772 Donald  
18 Douglas Loop North, Santa Monica, CA 90405. The information to be searched is described  
19 in the following paragraphs and in Attachment A. This affidavit is made in support of an  
20 application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and  
21 2703(c)(1)(A) to require Snapchat, Inc. to disclose to the government copies of the  
22 information (including the content of communications) further described in Section I of  
23 Attachment B. Upon receipt of the information described in Section I of Attachment B,  
24 government-authorized persons will review that information to locate the items described in  
25 Section II of Attachment B.

26           6.     The facts set forth in this Affidavit are based on my own personal knowledge;

27           7.     knowledge obtained from other individuals during my participation in this  
28 investigation, including other law enforcement officers; review of documents and records

related to this investigation; communications with others who have personal knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this Affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation.

8. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2422(b) (Enticement of a Minor), 18 U.S.C. § 2252(a)(2) (Receipt or Distribution of Child Pornography), and 18 U.S.C. § 2252(a)(4)(B) (Possession of Child Pornography), as well as attempt/conspiracy to commit those offenses (hereinafter the “TARGET OFFENSES”), have been committed by CLAYTON HARKER. There is also probable cause to search the information described in Attachment A for evidence, instrumentalities, contraband or fruits of these crimes further described in Attachment B.

9. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth each and every fact that I or others have learned during the course of this investigation. I have set forth only the facts that I believe are relevant to the determination of probable cause to believe that evidence, fruits, and instrumentalities of violations of will be found at the SUBJECT PREMISES or on the SUBJECT PERSON, or in the SUBJECT VEHICLES.

## THE INVESTIGATION

### Summary of the investigation

10. In November 2022, I received a request from the Homeland Security Investigations (HSI) Portland, Oregon office, SA Clinton Lindsly<sup>1</sup>, to assist in a child

<sup>1</sup> I asked SA Lindsly to provide a summary of his training and experience for inclusion in this affidavit, and he provided the following information:

I Clinton Lindsly have been employed as a Special Agent (SA) by the U.S. Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (HSI) since August 2010. I am

1 exploitation investigation involving an individual tentatively identified as (SUBJECT  
2 PERSON).

3 11. As part of HSI Portland, Oregon's case, on November 4, 2022, the Honorable  
4 Jolie A. Russo, United States Magistrate Judge, District of Oregon, authorized a search  
5 warrant for content and other records for a Snapchat user identified to be residing in Virginia  
6 ("VIRGINIA SNAPCHAT USER.")

7 12. On November 8, 2022, Snapchat responded and provided records to the above  
8 search warrant via their law enforcement portal. These records were downloaded by SA  
9 Lindsly and comprise approximately nine gigabytes of data. The records included media  
10 files, chat communications, IP records, subscriber information, and other records.

11 13. During a preliminary review of the records, SA Lindsly found thousands of  
12 media files (photographs and videos) that depicted sexually explicit content of females, most  
13 of whom appeared to be under the age of 18. These files appeared to have been sent and/or  
14 received from the VIRGINIA SNAPCHAT USER.

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15  
16  
17 currently assigned to the child exploitation unit in the HSI office in Portland, Oregon. Previously, I was  
18 assigned to the HSI office in Los Angeles, California, where I worked for over six years in a money laundering  
19 and narcotics group that specialized in undercover operations. In 2018, I transferred to HSI Portland and  
20 continued to specialize in money laundering and narcotics investigations until January 2020. My formal law  
21 enforcement training includes successfully completing the 23-week HSI basic training course at the Federal  
22 Law Enforcement Training Center in Glynco, Georgia. During that training, I learned how to conduct child  
23 exploitation investigations. Since then, I have been involved in many child exploitation investigations and have  
24 assisted federal and state partners during their investigations. As such, I have become familiar with ways that  
25 child pornography is shared, distributed, and/or produced, including the use of various social media websites  
26 (Facebook, Twitter, Kik, Snap Chat, Discord, etc.), "cloud" based storage, and peer-to-peer (P2P) networks.  
27 Often, individuals involved in child exploitation will collect or store images and/or videos on various media  
28 devices they keep at their residences, or in offsite locations such as "cloud" based storage. I have also become  
familiar with jargon or slang terms that people involved in child exploitation will use to discuss their activities.  
I have worked with agents involved in numerous investigations involving the sexual exploitation of children or  
the distribution, receipt, and possession of child pornography. I have participated in searches of premises and  
assisted in gathering evidence pursuant to search warrants, including search warrants in multiple child  
pornography investigations. I have participated in interviews of persons who possess and distribute child  
pornography.

I have participated in online undercover communications using messaging platforms with hundreds of people  
interested in the production, distribution, and receipt of child pornography. In my undercover role I have  
assisted in the administration of private chat groups dedicated to the production, distribution, and receipt of  
child pornography. As such, I have become familiar with platforms used to facilitate the production,  
distribution, and receipt of child pornography and their purposes.

1           14. The records also included the content of chat communications between  
2 VIRGINIA SNAPCHAT USER. and hundreds of other Snapchat users. SA Lindsly reviewed  
3 several of these chats and noted a reoccurring theme in the message content. SA Lindsly  
4 noted that the VIRGINIA SNAPCHAT USER was soliciting suspected underage females for  
5 sexually explicit content in exchange for money, representing himself as a model agency. In  
6 some instances, the VIRGINIA SNAPCHAT USER appeared to threaten the minor females  
7 for additional photographs and/or videos or that he would release them to family, friends, or  
8 the public.

9           15. SA Lindsly also saw that the VIRGINIA SNAPCHAT USER appeared to be  
10 advertising and selling the sexually explicit media files of the minor females in exchange for  
11 money and/or gift cards to other users.

12           16. SA Lindsly found several media files of child pornography that depicted  
13 prepubescent females under the age of 8.

14           17. Due to the sheer volume of records, a significant amount of time will be  
15 required to fully review and analyze the data. However, during the preliminary review SA  
16 Lindsly identified a chat communication between the VIRGINIA SNAPCHAT USER and  
17 another Snapchat user identified as the SUBJECT USER. The chat logs span June 29 –  
18 October 27, 2022, and included hundreds of messages between the VIRGINIA SNAPCHAT  
19 USER and the SUBJECT USER. The chat communications focused on discussion about the  
20 sexual exploitation of children and included discussions about sharing child pornography,  
21 selling child pornography, collecting child pornography, how to groom children to have them  
22 produce child pornography, the sexual trafficking of children, and raping children. The  
23 SUBJECT USER stated numerous times how he desired to rape a child and even offered the  
24 VIRGINIA SNAPCHAT USER \$1,000 to rape his seven-year-old niece, to which the  
25 VIRGINIA SNAPCHAT USER agreed to. The SUBJECT USER stated several times that he  
26 is a collector of child pornography, that he has received child pornography, described in  
27 detail child pornography he was viewing, and that he distributed child pornography. In one  
28 instance, on October 22, 2022, the SUBJECT USER appeared to share his home address,



1 which is the address of the SUBJECT PREMISES. The following messages are a sample of  
 2 the messages sent by the SUBJECT USER to the VIRGINIA SNAPCHAT USER:

3 **June 29, 2022:**

- 4 • That's. Rough. If u dont like it I just gave child porn for free. And some is
- 5 inaccessible currently. On thumb drives. I'd need a PC. To make a transfer.
- 6 • I have been collecting child porn for almost 10 years.It's crazy. .
- 7 • No. I dont have a computer. Right now.
- 8 • Can u send the photos and videos individually.
- 9 • My phone freaks out if I send u too many and if u send me to many. I need a new
- phone
- I'm absolutely hopelessly addicted to child porn.

10 **June 30, 2022:**

- 11 • How did u get all this cp?
- 12 • Ages 8 to 14 is my preference I. Age range
- 13 • The first girl u ever sent is so hot
- 14 • Will u include some 8 and 10 year olds in the folder?
- 15 • How much to talk to the 7 year old? Do u have more of her? I wanna sed her cunt
- 16 • I'd love to show all of these girls my cock.
- 17 • You are my exclusive supplier of child porn. And I don't care if they are implants.
- 18 And ill ltake the 13 year old with huge tits and a shaved cunt too!
- 19 • Okay. What about the sexy 7 year old, the first minor u sent me? I must have more of
- her
- Have any videos of the children getting fucked by men?
- This coming Thursday I have no plans for my money. Except cp

20 **July 1, 2022:**

- 21 • My child porn addiction is bad
- 22 • Can you trade me some of your cp for my cp?
- 23 • Child porn is life.
- 24 • I love producing child porn. I just d t have access to children.
- 25 • Know any girls in Washington state?
- 26 • When I get new cp from Kids i know I'll trade with you.
- 27 • You have videos of babies getting raped?
- 28 • Raping a baby would feel like a warm tight glove on my cock. I'd eat a toddlers
- snatch.

27 **July 3, 2022:**

- 28 • Babies and toddlers is mostly videos?

- After my 200\$ thats my next purchase. I must see some babies cunts gets stretched.
- Have a video of 3 men on one toddler? One in each hole?
- Know any toddlers that I could rape?

**July 4, 2022:**

- I'm genuinely excited to see a cute toddler getting raped.

**July 27, 2022:**

- Its child pornography. I'm always gonna see if I can buy some. I'm a fucking pedophile
- Jacking off to toddlers getting raped will be fun.

**August 1, 2022:**

- Child porn is life.

**August 2, 2022:**

- Ill send u any new child porn I acquire

**September 24, 2022:**

- Same girls cunt.
- Worth any trade?
- Shes 15
- Took ALOT of convincing to get her to do that without money. At least from me. So please if u can hook it up with like a 10 year old or somethin that would be awesome.
- I'm excited. Just send all the photos u get from her. Do I get a bonus for finding girls?
- No problem I'm masturbating to child pornography in the bathroom at work
- This cp u just sent. How old is the girls

**September 25, 2022:**

- Fucking hate children. I can tolerate cute girls if they aren't too annoying. Especially if I molest her first

**September 27, 2022:**

- I cant wait to put my cock in a toddlers cunt sometime
- Do you sell toddlers?
- In a while I'd want to buy one for me and my buddy to sexually assault, abuse, molest and rape.
- First I want to see the maternity ward video. And see some toddlers getting raped. I wanna hear thr bitch scream. And see some boys shit pipe get stretched and watch the toddler die :)
- Please send me Jagens folder. I worked so hard grooming her.
- I need that folder kia. I put over a year of work into that girl.



- I found more of my old child porn.

**September 28, 2022:**

- I have Mersades cp. And I'd consider sending it.
- I hope the kids I bring you are good.

**September 29, 2022:**

- I was thinking of getting a screen recording app for my phone for the cp from snapchat.

**October 1, 2022:**

- Watching these kids getting raped is amazing. Alot of the girls have nice cunts. And some with nice feet too.
- I want to have a daughter
- God I get so fucking horny watching these grown ass men, Raping these 7 year olds. Soooooo hot. I want to rape a kids tight uses up cunt. Call her a good 3 hole whore.

**October 7, 2022:**

- I got some cp from babygirl

**October 10, 2022:**

- I'm excited to rape a child

**October 11, 2022:**

- I jacked my cock off to child porn so much yesterday and the day before that my penis head is sensitive and hurts now
- It's all red under my foreskin. I literally couldn't stop, the 6 and 7 year old girls getting raped is so fucking hot.
- Ages 5 to 9 are the best
- I like it when the 5 year old sucks cock like a pro.

**October 22, 2022:**

- 416 lakeway drive Bellingham Washington 98225

18. On November 10, 2022, after reviewing the above chats, SA Lindsly "cold" messaged the SUBJECT USER using an undercover account (UC 1) to attempt to discuss the sexual exploitation of children and ascertain the identity of the user and whether the user had any access to children. Over the next several days, SA Lindsly communicated with the SUBJECT USER about the sexual exploitation of children. SA Lindsly's online persona included having a three-year-old child and an eight-year-old niece. The SUBJECT USER

1 told SA Lindsly that his name was "Clayton," that he resided in Bellingham (Washington),  
 2 that he worked at Fred Meyers pumping gas, that he was 26 years old, and provided his  
 3 cellular telephone number as (425-367-8752).

4 According to a police incident report from the Bellingham Police Department, CLAYTON  
 5 HARKER was the subject of an investigation in September 2021. HARKER Provided the  
 6 same phone number to the police that the SUBJECT USER provided to SA Lindsly.

7 19. Database queries with Washington Department of Licensing show a valid  
 8 Washington State Driver's License with an address of 416 Lakeway Drive, Bellingham, WA  
 9 98225, the SUBJECT PREMISES, for the SUBJECT PERSON.

10 20. Over the course of several days the SUBJECT USER expressed a strong desire  
 11 to meet up and have sex with SA Lindsly's fictitious daughter and/or niece. The SUBJECT  
 12 USER stated that he could travel by car with his roommate to potentially meet in a hotel in  
 13 Hillsboro, Oregon. The SUBJECT USER provided explicit details about the various sexual  
 14 acts that he would do when he met with the niece as detailed below. The SUBJECT USER  
 15 asked if he could take pictures during the sexual encounter.

16 21. The SUBJECT USER also sent SA Lindsly several images of child  
 17 pornography. For example, on November 11, 2022, the SUBJECT USER sent SA Lindsly  
 18 the following:

- 19 • A close-up photograph of a vagina being spread apart by a hand. When asked about  
 20 the photograph, the SUBJECT USER stated that it was of a "11-year-old spread open  
 21 pussy."
- 22 • A close-up photograph that depicted a vagina. When asked about the photograph, the  
 23 SUBJECT USER stated that it was of a "girl [he] used to know. She was 15 at the  
 24 time."

25 22. The SUBJECT USER also disclosed to SA Lindsly that within the last five  
 26 years, he had raped an "UNIDENTIFIED PREPUBESCENT CHILD". The SUBJECT  
 27 USER disclosed the following during the chats with the UC (many chats are omitted and the  
 28 below are just for example purposes):

SUBJECT USER: I molested the neighbors' daughter a few years

1		ago. She wandered into my yard, we lived in the
2		country at the time and I raped her. And I don't
3		have access the cheese usually.
4	UC 1:	dude that's so hot
5	SUBJECT USER:	I was 22 so like 5ish years ago
6	UC 1:	how old was she?
7	SUBJECT USER:	Not positive. But I'd say 6 maybe 5
8	UC 1:	how the hell she not tell anyone?
9		that's risky dude
10	SUBJECT USER:	I bought her a bike
11		And she liked me.
12	UC 1:	fuking hot. whatcha do to her?
13	SUBJECT USER:	She used to watch me watcher her in her kiddie
14		pool.
15	UC 1:	just the once? Seared into ur brain i bet
16	SUBJECT USER:	Now i watched her a lot. I took off her
17		swimsuit and took her into the tall grass and rubbed
18		my cock on the soles of her feet, and than fucked
19		her pussy hard til she's moaning. I think her dad
20		had been there before.
21		No
22		I watched her a lot
23		She wore bikinis at too young of an age and
24		would sometimes even be naked in the kiddie pool
25		I had binoculars
26	UC 1:	you got in her puss the first time?
27		She put up a good fight? rape so hot
28	SUBJECT USER:	Once I got her naked I told her to open her legs.
		Than asked her which hole she wants it in. She
		picked her pussy so I went to town. She knew
		what sex was.
		Didnt ask questions.

Her dad molested and raped her  
 Im weary abkutewhat I share. I don't want to be  
 labeled a pedophile and thrown in prison.  
 And be backstabbed.  
 My mom lived on a few shared acres at the time  
 With me and my buddy  
 It was my day off. Girls name was rose.  
 Nice chestnut brown hair. Cute puss looked  
 like a paper cut. Her dad is extremely short and  
 mad at everyone.  
 He hated me and my family immiediately when we  
 moved in.  
 Its an easement  
 Ma still lives there  
 Rose is grown up now  
 She waves at me when she sees me.  
 Still has the bike too.

UC 1: grown up? wouldnt she be like 10 now

SUBJECT USER: About maybe 11 or 12  
 I'm not over at my moms as much. I moved away

23. All the chat communications between SA Lindsly and the SUBJECT USER  
 were captured by screenshot.

24. On November 10, 2022, SA Lindsly subsequently served a summons on  
 Snapchat Inc, for records related to the SUBJECT USER.

25. On November 10, 2022, SA Lindsly subsequently served a summons on  
 AT&T for records related to phone number 425-367-8752. According to a review of the  
 provided records, SA Lindsly learned that the phone number has no subscriber information  
 as it a postpaid cell phone.

26. On November 14, 2022, Snapchat Inc, responded to the summons and provided  
 the following information. The SUBJECT USER has user ID: e1191bdf-9277-4dad-8022-  
 25e0772dc719, an email address of: [prilldroid94@gmail.com](mailto:prilldroid94@gmail.com), account created Thu Mar 19  
 02:19:06 UTC 2020, with an account creation IP address of 2600:387:b:9a2::58.

27. On November 21, 2022, the SUBJECT USER shared a Mega link with SA Lindsly. When clicked, SA Lindsly was able to access various folders that contained approximately 46.06 gigabytes of media files. The top layer folder was titled “caldito 3,” and had several additional folder structures inside that folder including “cecececee,” “DEEP WEB...,” “random,” “special young,” “Telegram Video,” and “Telegram Video.” SA Lindsly navigated several of these folders and saw thousands of media files, many of which were apparent child pornography. SA Lindsly did a video recording while he navigated through the various folders. Additionally, SA Lindsly downloaded several of the media files that were child pornography. For example:

***File Name: 1\_512081143740***

Duration: 15 minutes 7 seconds

Description: A video that depicted a female child approximately 4 – 6 years of age. An adult male appeared to hand the child an unknow sum of foreign currency. An adult male then rubbed his erect penis onto the vagina of the child. The child then performed oral sex on the adult male. The adult male eventually ejaculated onto the female child’s stomach.

***File Name: 2 Little Girls Suck Mans Dick so ( HOT )***

Duration: 4 minutes 4 seconds

Description: A video that depicted two female children approximately 4 – 6 years of age performing oral sex on an adult male with an erect penis. The adult male then attempted to have vaginal intercourse with one of the children.

***File Name: 2021-04-03 11.44.06***

Duration: 17 seconds

Description: A video that depicted a female child approximately 8 – 11 years of age perform oral sex on an adult male.

28. On November 22, 2022, I was contacted on Snapchat by the SUBJECT USER. My online persona was that of SA Lindsly’s eight-year-old niece. Over the next several weeks, I (UC 2) communicated with the SUBJECT USER. The SUBJECT USER asked me

1 to send him a picture of myself. The SUBJECT USER detailed the various sexual acts he  
2 wanted to do to the eight-year-old girl.

3 29. Over the course of several weeks the SUBJECT USER expressed a strong  
4 desire to meet up and have sex with the eight-year-old girl, and provided explicit details  
5 about the various sexual acts that he would do when he met with me as detailed below. For  
6 example (many chats are omitted and the below are just for example purposes):

7 **November 23, 2022:**

8 SUBJECT USER: sent photo of himself (PHOTO 1)  
9 that's me  
10 I want to show you my penis  
11 Badly

12 UC 2: Ok...Ive only sen daddy's and unkle Js before

13 SUBJECT USER: may I show you mine?

14 UC 2: Sur if you want  
15 To

16 SUBJECT USER: well I'm touching it now  
17 Makes it hard

18 SUBJECT USER: I'm gonna send a photo soon  
19 Sent a photo of a males penis with a green/blue  
20 bedsheet in the background and a brown freckle on  
21 the right hand side of the shaft of the penis.

22 UC 2: Unkle j toihs his kock

23 SUBJECT USER: I touch my cock too. Do you like my cock?

24 UC 2: it big  
25 Lik lolypop

26 SUBJECT USER: Thanks! I'd love to have your mouth on it

27 UC 2: yum

28 SUBJECT USER: I'm excited  
Wanna put it in your puss?



1 UC 2: I bett that wud feal good

2  
3 SUBJECT USER: yes  
4 Would you want that?

5  
6 **November 24, 2022:**

7 SUBJECT USER: would you show me your feet?  
8 Morning beautiful

9 UC 2: Morning  
10 Ica but ltr mommy is helping me with skoolwok

11 **November 26, 2022:**

12 SUBJECT USER: Gooim at work  
13 Good  
14 I'm at work

15 UC 2: where do you work

16 SUBJECT USER: a gas station  
17 I want to show my penis later  
18 Its boring. But at least I'm paid  
19 You wou send me a photo of your pussy or feet  
20 later?  
21 Ahhh. I see  
22 I'll just wait until I meet you  
23 I'll be brining my Camera with me

24 UC 2: yay! Wen? I can't wait

25 SUBJECT USER: After the new year. Spring time. I'm excited to  
26 have sex with you.

27 UC 2: triing to learn snap sorry I m not vary good

28 SUBJECT USER: No problem  
You excited to do some nude modeling for me?

UC 2: why spring? So ling  
Ok I wait

1                   SUBJECT USER:                   cause of weather  
2

3 **November 29, 2022:**

4                   SUBJECT USER:                   I want to try some very adult things with you

5                   UC 2:                            I dun some

6                   SUBJECT USER:                   yeah?  
7   Fun!

8                   UC 2:                            It was lotts of fun  
9   Every time

10                  SUBJECT USER:                  Ever been peed on? Is that something you  
11   would want?

12                  UC 2:                            maybe  
13   If u like  
14   Do you like me

15                  SUBJECT USER:                  I do like you. Yes. Is that okay?

16                  UC 2:                            Oh yea it is

17                  SUBJECT USER:                  I'd like to pee on you sometime. Sorry if that's  
18   gross

19                  UC 2:                            Not gross but diff.....  
20   Id try  
21   Ware do you pee on me

22                  SUBJECT USER:                  We can start on your chest  
23   I'm very kinky. I like a bunch of different sexy  
24   things.

25                  UC 2:                            That fun

26                  SUBJECT USER:                  I don't have sex a lot though  
27   Hardly ever  
28   I'm excited to see you naked  
   Me and your uncle may both fuck your holes

1		Sorry
2	UC 2:	unkle J and I have fun
3		Why sorry??
4	SUBJECT USER:	I'm not sure
5		I hope you and I have fun
6		Would you rub your feet on my penis?
7	<b>November 30, 2022:</b>	
8	SUBJECT USER:	Back at work
9		Wish you give me head at work
10	UC 2:	Pepplesee?
11		Head?
12	SUBJECT USER:	Head. Is a blowjob. Sucking my penis
13	SUBJECT USER:	would you ever drink my pee?
14	UC 2:	Unmmm I don't think prob not.:. kinda grose
15	SUBJECT USER:	yes I do like that. I'm kinda gross. I was
16		touching my penis while looking looking and at a
17		photo of you.
18	SUBJECT USER:	I'm a nasty freak. I want to put whipped
19		creamin your butthole.
20	UC 2:	in bed today again.
21		In sid?
22	SUBJECT USER:	😊
23		What
24		I want to see you
25	UC 2:	com visit
26		Unkle J told me I can't
27	SUBJECT USER:	I want to soon
28		I'm excited to see your boobs

1 UC 2: hehe  
2 I got a new braw  
3 Mommy sayd it's a trainer  
4 SUBJECT USER: hehe  
5 Cute  
6 When I get home from work, can I send u a pic  
7 of my cock?  
8 UC 2: I mean unkle J sayd u can't come visit soon but I  
9 want to c u  
10 SUBJECT USER: I have work. Maybe if I take some time off.  
11 I'm pretty busy though  
12 I like showing my cock to little girls  
13 UC 2: Lik me 😊  
14 SUBJECT USER: yes  
15 😊  
16 I'll stroke it for you  
17 UC 2: stroke it?  
18 SUBJECT USER: masterubate  
19 I used to wag my cock at the neighbor girl  
20 UC 2: she like?  
21 SUBJECT USER: Yes  
22 She used to stare at it  
23 I used to just look at her and masturbate  
24 UC 2: that fun  
25 SUBJECT USER: Yeah. Lol  
26 It was  
27 I'm excited to take a bunch of photos of you.  
28 My cock is sometimes kinda smelly  
There are a bunch of things I want to do to you

1 UC 2: Lik what

2  
3 SUBJECT USER: fill your butt with whipped cream and than fuck  
4 your ass.

5 UC 2: whipped cream is sooooooooo good

6 SUBJECT USER: Put my cock in your mouth and pussy. Cum in  
7 you. Have you ride my cock. And take a bunch of  
8 photos of you having sex with me.

9 UC 2: I dun that wit daddy and unkle J

10 SUBJECT USER: Hot!

11 UC 2: ooops  
12 I told not to tell

13 SUBJECT USER: I'd like to gangbang you. Me your uncle and dad all  
14 fucking you.

15 UC 2: Daddy let u?

16 SUBJECT USER: Idk  
17 At least me and your uncle

18 UC 2: Plllllllease

19 SUBJECT USER: I'm excited to fuck your holes. Use you like a  
20 fuck doll.

21 UC 2: I lik dollys  
22 I excited

23 SUBJECT USER: Me too. I'm gonna fuck you so hard and deep. I  
24 wanna make you moan.  
25 Can I hear your voice? I can sens u a voice  
26 message if u like

27 UC 2: My mommy is wit me cleanen my rom I sic  
28

1	SUBJECT USER:	I like when little girls like to get used as a sex toy.
2		I'm gonna slam my cock in your pussy as hard as
3		I can
4	UC 2:	And fuck you like a pornstar
5		a pornstar?
6		What is it
7	SUBJECT USER:	An adult woman or man that has sex on camera for
8		money.
9	UC 2:	how much \$\$\$
10	SUBJECT USER:	no idea
11		It depends pe studio
12		Some sex acts make more money than others
13		I love porn
14		They can make thousands of dollars
15	UC 2:	Cud I do that?
16	SUBJECT USER:	Once you turn 18 yes
17		I will be taking photos of us having sex
18		(sent a photo of his penis. The same brown freckle is
19		noticeable on this picture).
20		That's my cock at work
21		You will be the first child I take naked photos of
22	UC 2:	my frinds birthday is next week I going to parte
23		She will be like me
24	SUBJECT USER:	Fun!
25		Like you?
26	UC 2:	😊 8
27	SUBJECT USER:	oh sexual?
28	SUBJECT USER:	adults don't really have birthday parties
29	UC 2:	I get u a present
30		When is ur birthday
31		What do u lik



1           SUBJECT USER:                   I'm December 15<sup>th</sup>.  
2   I like video games, sex, and gift cards

3           SUBJECT USER:                   (sent a photo of his penis. The same brown freckle is  
4   noticeable on this picture).

5 **December 3, 2022:**

6           SUBJECT USER:                   sent picture of himself (PHOTO 2)  
7   I got my hair cut  
8   I'd love to have you lick my butthole and ballsack.  
9   Sent a picture of his penis

10           30.     All the communication between myself and the SUBJECT USER were  
11                       captured by screenshot.

### 12   **BACKGROUND CONCERNING ONLINE ACCOUNTS**

13           31.     As explained herein, information stored in connection with an online account  
14                       may provide crucial evidence of the “who, what, why, when, where, and how” of the  
15                       criminal conduct under investigation, thus enabling the United States to establish and prove  
16                       each element or alternatively, to exclude the innocent from further suspicion.

17           32.     In my training and experience, the information stored in connection with an  
18                       online account can indicate who has used or controlled the account. This “user attribution”  
19                       evidence is analogous to the search for “indicia of occupancy” while executing a search  
20                       warrant at a residence. For example, email communications, contacts lists, and images sent  
21                       (and the data associated with the foregoing, such as date and time) may indicate who used or  
22                       controlled the account at a relevant time.

23           33.     Further, information maintained by the online provider can show how and  
24                       when and where the account was accessed or used. For example, as described below, online  
25                       providers typically log the Internet Protocol (IP) addresses from which users access an  
26                       account, along with the time and date of that access. By determining the physical location  
27                       associated with the logged IP addresses, investigators can understand the chronological and  
28                       geographic context of the online storage account access and use relating to the crime under  
                      investigation. This geographic and timeline information may tend to either inculcate or

1 exculpate the account owner. Additionally, information stored at the user's account may  
2 further indicate the geographic location of the account user at a particular time (e.g., location  
3 information integrated into an image or video sent via email).

4 34. Stored electronic data may provide relevant insight into the online account  
5 owner's state of mind as it relates to the offense under investigation. For example,  
6 information in the online storage account may indicate the owner's motive and intent to  
7 commit a crime (e.g., communications relating to the crime), or consciousness of guilt (e.g.,  
8 deleting communications in an effort to conceal them from law enforcement).

9  
10 **BACKGROUND CONCERNING SNAPCHAT, INC.**

11 35. Snapchat is one of the most popular applications for sending and receiving  
12 "self-destructing" messages, pictures, and videos. Referred to as "snaps," the company  
13 processes approximately 700 million messages every day on Apple's iOS and Google's  
14 Android operating systems. Snapchat users access the application frequently. According to  
15 marketing material provided by the company, the average Snapchat user checks their account  
16 14 times a day. Snapchat also offers several other features including "Our Stories," "Story,"  
17 messaging, and Snapcash.

18 36. A "snap" is a picture or video message taken and shared with other Snapchat  
19 users in real time. The sender of a snap has the option of setting a timer for how long a snap  
20 can be viewed. Once a snap has been viewed it is deleted from the company's system and is  
21 no longer visible to the recipient unless the recipient takes steps to record it while viewing it.  
22 Snapchat users can send text messages to others using the Chat feature. Once a user leaves  
23 the Chat screen, messages viewed by both the sender and the receiver will no longer be  
24 visible. The application notifies other users when they are online so they can begin  
25 messaging each other. In addition, Snapchat users can send pictures to other users by  
26 utilizing the camera on their device. Pictures can also be sent from the saved pictures in the  
27 photo gallery of the device. "Snaps" constitute "electronic communications" within the  
28 meaning of 18 U.S.C. § 3123. See 18 U.S.C. §§ 3127(1) and 2510(12).

37. When a user creates an account, they choose a unique Snapchat username. This is the name that is visible to other Snapchat users. An e-mail address is required to register a Snapchat account. A new user is asked to also provide a mobile phone number. The e-mail address or phone number is verified during the registration process.

38. Therefore, the Snapchat, Inc. servers are likely to contain stored information concerning subscribers and their use of Snapchat, Inc. services. In my training and experience, such information may constitute evidence of the crimes under investigation including information that can be used to identify the account's user or users.

### **PERSONS WITH A SEXUALIZED INTEREST IN CHILDREN AND DEPICTIONS OF CHILDREN**

39. Based upon my knowledge, experience, and training in child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, I know that there are certain characteristics common to individuals who have a sexualized interest in children and depictions of children:

a. They may receive sexual gratification, stimulation, and satisfaction from contact with children; or from fantasies they may have viewing children engaged in sexual activity or in sexually suggestive poses, such as in person, in photographs, or other visual media; or from literature describing such activity.

b. They may collect sexually explicit or suggestive materials in a variety of media, including photographs, magazines, motion pictures, videotapes, books, slides, and/or drawings or other visual media. Such individuals often times use these materials for their own sexual arousal and gratification. Further, they may use these materials to lower the inhibitions of children they are attempting to seduce, to arouse the selected child partner, or to demonstrate the desired sexual acts. These individuals may keep records, to include names, contact information, and/or dates of these interactions, of the children they have attempted to seduce, arouse, or with whom they have engaged in the desired sexual acts.

1 c. They often maintain any “hard copies” of child pornographic material  
2 that is, their pictures, films, video tapes, magazines, negatives, photographs, correspondence,  
3 mailing lists, books, tape recordings, etc., in the privacy and security of their home or some  
4 other secure location. These individuals typically retain these “hard copies” of child  
5 pornographic material for many years, as they are highly valued.

6 d. Likewise, they often maintain their child pornography collections that  
7 are in a digital or electronic format in a safe, secure and private environment, such as a  
8 computer and surrounding area. These collections are often maintained for several years and  
9 are kept close by, often at the individual’s residence or some otherwise easily accessible  
10 location, to enable the owner to view the collection, which is valued highly. They also may  
11 opt to store the contraband in cloud accounts. Cloud storage is a model of data storage where  
12 the digital data is stored in logical pools, the physical storage can span multiple servers, and  
13 often locations, and the physical environment is typically owned and managed by a hosting  
14 company. Cloud storage allows the offender ready access to the material from any device  
15 that has an Internet connection, worldwide, while also attempting to obfuscate or limit the  
16 criminality of possession as the material is stored remotely and not on the offender’s device.

17 e. They also may correspond with and/or meet others to share information  
18 and materials; rarely destroy correspondence from other child pornography  
19 distributors/collectors; conceal such correspondence as they do their sexually explicit  
20 material; and often maintain lists of names, addresses, and telephone numbers of individuals  
21 with whom they have been in contact and who share the same interests in child pornography.

22 f. They generally prefer not to be without their child pornography for any  
23 prolonged time period. This behavior has been documented by law enforcement officers  
24 involved in the investigation of child pornography throughout the world.

25 g. E-mail itself provides a convenient means by which individuals can  
26 access a collection of child pornography from any computer, at any location with Internet  
27 access. Such individuals therefore do not need to physically carry their collections with  
28 them but rather can access them electronically. Furthermore, these collections can be stored

1 on email “cloud” servers, which allow users to store a large amount of material at no cost,  
2 without leaving any physical evidence on the users’ computer(s).

3 40. In addition to offenders who collect and store child pornography, law  
4 enforcement has encountered offenders who obtain child pornography from the internet,  
5 view the contents and subsequently delete the contraband, often after engaging in self-  
6 gratification. In light of technological advancements, increasing Internet speeds and  
7 worldwide availability of child sexual exploitative material, this phenomenon offers the  
8 offender a sense of decreasing risk of being identified and/or apprehended with quantities of  
9 contraband. This type of consumer is commonly referred to as a ‘seek and delete’ offender,  
10 knowing that the same or different contraband satisfying their interests remain easily  
11 discoverable and accessible online for future viewing and self-gratification. I know that,  
12 regardless of whether a person discards or collects child pornography he/she accesses for  
13 purposes of viewing and sexual gratification, evidence of such activity is likely to be found  
14 on computers and related digital devices, including storage media, used by the person. This  
15 evidence may include the files themselves, logs of account access events, contact lists of  
16 others engaged in trafficking of child pornography, backup files, and other electronic  
17 artifacts that may be forensically recoverable.

18 41. In some cases, e-mail account users will communicate directly with an e-mail  
19 service provider about issues relating to the account, such as technical problems, billing  
20 inquiries, or complaints from other users. E-mail providers typically retain records about  
21 such communications, including records of contacts between the user and the provider's  
22 support services, as well records of any actions taken by the provider or user as a result of  
23 the communications. In my training and experience, such information may constitute  
24 evidence of the crimes under investigation because the information can be used to identify  
25 the account’s user or users.

26 42. Given the above-stated facts and based on my knowledge, training, and  
27 experience, along with my discussions with other law enforcement officers who investigate  
28 child exploitation crimes, I believe that the SUBJECT USER likely has a sexualized interest

1 in children and depictions of children. I therefor believe evidence of the TARGET  
2 OFFENSES is likely to be found in the SUBJECT USER's Snapchat account.

3 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

4 43. Pursuant to Title 18, United States Code, Section 2703(g), this application and  
5 affidavit for a search warrant seeks authorization to permit Snapchat, Inc. and its agents and  
6 employees, to assist agents in the execution of this warrant. Once issued, the search warrant  
7 will be presented to Snapchat, Inc. with direction that it identifies the Snapchat, Inc. account  
8 described in Attachment A to this affidavit, as well as other subscriber and log records  
9 associated with the account, as set forth in Section I of Attachment B to this affidavit.

10 44. The search warrant will direct Snapchat, Inc. to create an exact copy of the  
11 specified account and records.

12 45. I, and/or other law enforcement personnel will thereafter review the copy of  
13 the electronically stored data and identify from among that content those items that come  
14 within the items identified in Section II to Attachment B, for seizure.

15 46. Analyzing the data contained in the forensic image may require special  
16 technical skills, equipment, and software. It could also be very time-consuming. Searching  
17 by keywords, for example, can yield thousands of "hits," each of which must then be  
18 reviewed in context by the examiner to determine whether the data is within the scope of the  
19 warrant. Merely finding a relevant "hit" does not end the review process. Keywords used  
20 originally need to be modified continuously, based on interim results. Certain file formats,  
21 moreover, do not lend themselves to keyword searches, as keywords, search text, and many  
22 common e-mail, database and spreadsheet applications do not store data as searchable text.  
23 The data may be saved, instead, in proprietary non-text format. And, as the volume of  
24 storage allotted by service providers increases, the time it takes to properly analyze  
25 recovered data increases, as well. Consistent with the foregoing, searching the recovered  
26 data for the information subject to seizure pursuant to this warrant may require a range of  
27 data analysis techniques and may take weeks or even months. All forensic analysis of the  
28



1 data will employ only those search protocols and methodologies reasonably designed to  
2 identify and seize the items identified in Section II of Attachment B to the warrant.

3 47. Based on my experience and training, and the experience and training of other  
4 agents with whom I have communicated, it is necessary to review and seize a variety of IP  
5 logs, registration e-mail addresses, source of payment, and documents, that identify any users  
6 of the subject account.

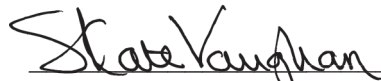
## CONCLUSION

48. Based on the forgoing, I request that the Court issue the proposed search warrant. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that - has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i). Pursuant to 18 U.S.C. § 2703(g), the government will execute this warrant by serving the warrant on Snapchat, Inc. Because the warrant will be served on Snapchat, Inc. who will then compile the requested records and data, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night. Accordingly, by this Affidavit and Warrant, I seek authority for the government to search all of the items specified in Section I, Attachment B (attached hereto and incorporated by reference herein) to the Warrant, and specifically to seize all of the data, documents and records that are identified in Section II to that same Attachment.

**KRYSTLE L**  
**MENDOZA**  
 Digitally signed by  
 KRYSTLE L  
 MENDOZA  
 Date: 2022.12.16  
 09:47:35 -08'00'

Krystle Mendoza, Special Agent  
 Department of Homeland Security  
 Homeland Security Investigations

The above-named agent provided a sworn statement to the truth of the foregoing affidavit by telephone on this 19th day of December, 2022

  
 S. KATE VAUGHAN  
 United States Magistrate Judge

ATTCHMENT A

Accounts to be Searched

This warrant applies to information associated with the following Snapchat, Inc account:

- a. **Subject Account:** “j\_smith5892” with User ID e1191bdf-9277-4dad-8022-25e0772dc719 and associated email address [prilldroid94@gmail.com](mailto:prilldroid94@gmail.com); (“the Account”)

and referred to as the **Subject Account** which is stored at a premises owned, maintained, controlled, or operated by Snapchat, Inc. (“Snapchat” or “Provider”), which receives legal process at 2772 Donald Douglas Loop North, Santa Monica, CA 90405. Snapchat receives legal process via their Law Enforcement Service Site.

**ATTACHMENT B**

**I. Section I - Information to be disclosed by Snapchat, Inc, hereinafter “Provider” for search:**

1. The following information or data associated with the Snapchat account for Snapchat account “j\_smith5892” with User ID e1191bdf-9277-4dad-8022-25e0772dc719 and associated email address [prilldroid94@gmail.com](mailto:prilldroid94@gmail.com) (“the Account”), as described in Attachment A, which is within Snapchat, Inc.’s possession, custody, or control, including all records, files, logs, or information that have been deleted but are still available to Snapchat, Inc., or that have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), for the time period of account inception, to the date of the execution of the search warrant:

- a. The contents of all storage Account belonging to or accessed by the Account, including images, videos, and other files, associated upload/download dates and timestamps, and IP addresses from which the files were uploaded or to which they were downloaded.
- b. Internet search data, including queries and location data.
- c. Subscriber information associated with the Account, contents of posts, comments, and photos, including date and timestamp.
- d. Files created by, uploaded to, or accessed by the Account.
- e. Payment information, including billing address, shipping address, and payment instruments, associated with any service used by the Account.
- f. Conversation logs, images, or videos, and associated upload or download dates and timestamps for the Account.
- g. Records pertaining to communications between Provider and any person regarding the Account, including contacts with support services and records of actions taken.
- h. Records or other information pertaining to the Account, including all files, databases, and database records stored by Provider in relation to the Account or identifiers.

i. Information that might identify the subscribers related to the Account, including names, addresses, telephone numbers, and other identifiers; email addresses; business information; the length of service (including start date); means and source of payment for services (including any credit card or bank account number); the IP address used to register the account; log-in IP addresses associated with session times and dates; and information about any domain name registration.

j. The types of service utilized.

k. The contents of all messages, emails, and chat messages associated with the Subject Account, including stored or preserved copies, the source and destination addresses associated with any messages, the date and time at which each email or message was sent or received, the size and length of each message, and attachments to any e-mail or message sent or received.

l. Provide the device information for the target Snapchat account, if any, to include IMEI/MEID, make and model, serial number, date and IP of last access to Snapchat, and a list of all Account that have ever been active on the device.

2. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer shall not be required for the service or execution of the search warrant.

**The Provider is hereby ordered to disclose the above information to the government within 14 DAYS of issuance of this warrant.**

## **II. Section II - Information to be seized by the government**

All information described above in Section I that constitutes fruits, contraband, evidence and instrumentalities of violations of 18 U.S.C. § 2422(b) (Enticement of a Minor), 18 U.S.C. § 2252(a)(2), (b)(1) (Receipt/Distribution of Child Pornography), and 18 U.S.C. § 2252(a)(4)(B), (b)(2) (Possession of Child Pornography), as well as attempt or conspiracy to commit such offenses, those violations, including for each account or identifier listed on Attachment A, information pertaining to the following matters:

1           a. All messages, documents, and profile information, attachments, or other data  
2 that serves to identify any persons who use or access the accounts specified, or who exercise in any  
3 way any dominion or control over the specified accounts;

4           b. Evidence indicating the Account owner's state of mind as it relates to the  
5 crimes under investigation;

6           c. Any address lists or "friend"/contact lists associated with the specified  
7 accounts;

8           d. All visual depictions of minors, including those involving minors engaged in  
9 sexually explicit conduct and any profile information from other file or photo-sharing websites or  
10 applications.

11           e. Any messages, communications, or documents relating to the possession,  
12 transmission, solicitation or creation of visual depictions of minors engaged in sexually explicit  
13 conduct or the sexual exploitation or enticement of minors (including any attachments thereto);

14           f. All subscriber records associated with the specified accounts, including name,  
15 address, local and long-distance telephone connection records, or records of session times and  
16 durations, length of service (including start date) and types of service utilized, telephone or  
17 instrument number or other subscriber number or identity, including any temporarily assigned  
18 network address, and means and source of payment for such service) including any credit card or  
19 bank account number;

20           g. Any and all other log records, including IP address captures, associated with  
21 the specified accounts; and

22           h. Any records of communications between Snapchat and any person about  
23 issues relating to the accounts, such as technical problems, billing inquiries, or complaints from other  
24 users about the specified accounts. This to include records of contacts between the subscriber and  
25 the provider's support services, as well as records of any actions taken by the provider or subscriber  
26 as a result of the communications.  
27  
28

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC  
RECORDS PURSUANT TO FEDERAL RULES OF EVIDENCE  
902(11) AND 902(13)**

I, \_\_\_\_\_, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by [PROVIDER], and my title is \_\_\_\_\_ . I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of [PROVIDER]. The attached records consist of \_\_\_\_\_ [GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)]. I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of [PROVIDER], and they were made by [PROVIDER] as a regular practice; and

b. such records were generated by [PROVIDER'S] electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of [PROVIDER] in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by [PROVIDER], and at all times pertinent to the records certified here the process and system functioned properly and normally.



1 I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the  
2 Federal Rules of Evidence.

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5  
6 Date

Signature  
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